

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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| IN RE: | : | CHAPTER 7 |
| | : | |
| TIM DOUPE | : | CASE NO. 1:21-bk-00837 |
| Debtor | : | |
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MOTION TO REOPEN CLOSED CASE

COMES NOW, the Debtor, by and through Kara K. Gendron, Esquire, and makes this Motion, respectfully stating in support thereof:

1. The Debtor filed a voluntary Chapter 7 Petition on April 15, 2021 and had as counsel Sean Patrick Quinlan of Quinlan Law Office. The Debtor contacted Attorney Quinlan; however, he is no longer practising bankruptcy law and advised the Debtor to contact the undersigned.
2. The Debtor's discharge was granted on 07/26/2021 and the case was closed thereafter.
3. The Debtor was attempting to close a real estate transaction and discovered that two judgments remained outstanding. The undersigned contacted the judgment holders but they will not release the liens without the case being reopened and an order avoiding each judgment.
4. The Debtor seeks to reopen the case in order to avoid the judgments.

WHEREFORE, the Debtor respectfully request this Honorable Court to reopen the above-captioned closed bankruptcy proceeding for the purpose of filing motions to avoid judgments.

Respectfully submitted,

/s/ Kara K. Gendron

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O R D E R

UPON consideration of the foregoing Motion to reopen the closed bankruptcy proceeding, good reason appearing therefor, it is

HEREBY ORDERED AND DECREED that the above-captioned proceeding be and hereby is reopened.